

MAY 02 2003

FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

BEFORE THE FEDERAL ELECTION COMMISSION

2003 MAY -2 P 3 14

MUR 4974

**SENSITIVE**

In the Matter of )  
Tiberi for Congress and )  
Jeffrey T. Benton, as treasurer )  
Friends of Tiberi and )  
William L. Curlis, as treasurer )  
Patrick Joseph Tiberi )  
Citizens for Mead and )  
Thomas J. Riley, as treasurer )  
Citizens for Gardner and )  
Randy Gardner, as treasurer )  
Leadership PAC 2002 and )  
Pamela Sederholm, as treasurer )  
Florida Republican Leadership PAC and )  
Donna F. Winterson, as treasurer )

GENERAL COUNSEL'S REPORT # 2

**I. ACTIONS RECOMMENDED**

Accept the attached joint conciliation agreement with Tiberi for Congress and Jeffrey T. Benton, as treasurer, and Friends of Tiberi and William L. Curlis, as treasurer; take no further action against Citizens for Mead and Thomas J. Riley, as treasurer, Citizens for Gardner and Randy Gardner, as treasurer, Leadership PAC 2002 and Pamela Sederholm, as treasurer, and Florida Republican Leadership PAC and Donna F. Winterson, as treasurer; and close the file as to all of the above and Patrick Joseph Tiberi.

**II. DISCUSSION**

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The Commission also found reason to believe that Citizens for Mead and Thomas J. Riley, as treasurer; Citizens for Gardner and Randy Gardner, as treasurer; Leadership PAC 2002 and Pamela Sederholm, as treasurer; and Florida Republican Leadership PAC and Donna F. Winterson, as treasurer, each violated 2 U.S.C. § 441f by permitting their names to be used to effect contributions in the name of another, but did not enter into pre-probable cause conciliation with these committees. The Commission took no action regarding Patrick Joseph Tiberi.

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Based on the above,

this Office recommends that the Commission accept the attached signed joint conciliation agreement submitted by Tiberi for Congress and Jeffrey T. Benton, as treasurer, and Friends of Tiberi and William L. Curlis, as treasurer; take no further action against Citizens for Mead and Thomas J. Riley, as treasurer, Citizens for Gardner and Randy Gardner, as treasurer, Leadership PAC 2002 and Pamela Sederholm, as treasurer, and Florida Republican Leadership PAC and Donna F. Winterson, as treasurer; and close the file in this matter.<sup>1</sup>

**III. RECOMMENDATIONS**

1. Accept the attached signed conciliation agreement submitted by Tiberi for Congress and Jeffrey T. Benton, as treasurer, and Friends of Tiberi and William L. Curlis, as treasurer.
2. Take no further action against Citizens for Mead and Thomas J. Riley, as treasurer.
3. Take no further action against Citizens for Gardner and Randy Gardner, as treasurer.
4. Take no further action against Leadership PAC 2002 and Pamela Sederholm, as treasurer.
5. Take no further action against Florida Republican Leadership PAC and Donna F. Winterson, as treasurer.
6. Approve the appropriate letters.

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<sup>1</sup> Closing the file in this matter will also terminate the matter as it pertains to Patrick Joseph Tiberi, with respect to whom the Commission took "no action at this time" on November 5, 2002.

7. Close the file.

Lawrence H. Norton  
General Counsel

5/2/03

Date

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